

DANIAL O. LAIRD, ESQ.
Nevada Bar No. 11831
Dan@LairdLaw.com
LAIRD LAW PLLC
8991 West Flamingo Road, Suite C
Las Vegas, Nevada 89147
(702)202-3091 (Telephone)
(702)202-1992 (Facsimile)
Attorney for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

JAMES WATERS,

Plaintiff,

vs.

THE UNITED STATES OF AMERICA,

Defendant.

Case No. 2:21-cv-01719-JAD-EJY

**Stipulation and Order to Extend
Deadlines for Opposition and
Reply to Defendant's Motion to
Dismiss, or in the Alternative, to
Strike Portions of Complaint
(First Request)**

Pursuant to Rule 6(b)(1) of the Federal Rules of Civil Procedure and Rule IA 6-1 of this Court's Local Rules, the parties, through undersigned counsel, stipulate to a two week extension, from December 6, 2021 to December 20, 2021, for Plaintiff to file its opposition to Defendant's Motion to Dismiss (ECF No. 11, filed on 11/22/21). This is the first request to extend the opposition and reply deadlines.

Since the filing of Defendant's Motion to Dismiss, undersigned counsel has had to devote time and attention to other matters including the death of a blood relative due to SARS-CoV2.

Given these circumstances and other duties, undersigned counsel requires the additional time requested herein to adequately prepare the opposition brief in the present matter. Accordingly, the parties stipulate to extend the deadline for the Plaintiff's opposition brief from December 6, 2021 to December 20, 2021. Parties further stipulate the Defendant USA's Reply to Plaintiff's Opposition will be due on or before December 31,

2021.

This stipulated request is submitted for the reasons explained above, in good faith, and for purposes of undue delay.

Respectfully submitted this the 6th day of December, 2021.

LAIRD LAW PLLC

/s/ Danial Laird

By:

DANIAL LAIRD, ESQ.
Nevada Bar No. 11831
8991 West Flamingo Road, Suite C
Las Vegas, NV 89147
Attorneys for Plaintiffs

CHRISTOPHER CHIOU
Acting United States Attorney

/s/ Patrick A. Rose

By:

PATRICK A. ROSE
Assistant United States Attorney
Attorneys for the United States

IT IS SO ORDERED:


UNITED STATES DISTRICT JUDGE

Dated: 12/7/2021

LAIRD LAW PLLC
8991 West Flamingo Road, Suite C
Las Vegas, Nevada 89147
Phone: 702/202-3091 Fax: 702/202-1992